

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**CARL CANNON**

*Plaintiff,*

v.

**GOLDEN TRUCKING, LLC AND  
JOHN DOE**

*Defendants.*

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**CIVIL ACTION NO. 1:21-cv-01025**

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**INDEX OF STATE COURT FILE**

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The following is an index identifying each state court document and the date in which each document was filed in the 201<sup>st</sup> Judicial District Court, Travis County, Texas.

<b>EXHIBIT</b>	<b>DATE</b>	<b>DOCUMENT</b>
<b>2</b>		Index of State Court File
<b>2a</b>	11/12/2021	Court Docket Sheet
<b>2b</b>	09/29/2021	Plaintiff's Original Petition
<b>2c</b>	10/11/2021	Citation for Golden Trucking, LLC
<b>2d</b>	10/21/2021	Return of Service to Texas Secretary of State
<b>2e</b>	10/22/2021	Texas Deputy Secretary of State's Service Process forward to Golden Trucking, LLC – Certified Mail (Return Receipt Requested)
<b>2f</b>	11/11/2021	Golden Trucking, LLC's Original Answer
<b>2g</b>	11/11/2021	Golden Trucking, LLC's Jury Demand

# **EXHIBIT 2a**

# Online Case Information

No new case information or documents filed after 9/27/2021 is available at this time.

## Loading Online Case Information...

### Details

Updated : Friday, November 12, 2021 4:36:21 AM

[New Search](#)
[Request Documents](#)

**Cause Number** D-1-GN-21-004933  
**Case Status** PENDING  
**Style** CANNON VS GOLDEN TRUCKING LLC  
**Filed Date** 9/3/2021  
**Hearing Date** --

Attorney	Type	Full/Business Name	First Name	Middle Name	Last Name
	DEFENDANT		JOHN		DOE
	DEFENDANT	GOLDEN TRUCKING LLC			
DOW JASON LUKE	PLAINTIFF		CARL		CANNON

Event Date	Party Type	Description
9/23/2021	DF	EXECUTED SERVICE
9/14/2021	DF	ISS:CITATION
9/3/2021	PL	ORIGINAL PETITION/APPLICATION

[New Search](#)

# **EXHIBIT 2b**

**CAUSE NO. D-1-GN-21-004933**

**CARL CANNON,**

*Plaintiff,*

**V.**

**GOLDEN TRUCKING LLC and  
JOHN DOE,**

*Defendants.*

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**IN THE DISTRICT COURT OF**

**TRAVIS COUNTY, T E X A S**

**201<sup>ST</sup> JUDICIAL DISTRICT**

**PLAINTIFF'S FIRST AMENDED PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Plaintiff CARL CANNON and complains of Defendants GOLDEN TRUCKING LLC ("GOLDEN") and JOHN DOE ("DOE") and respectfully shows the court as follows:

**I.**

**DISCOVERY CONTROL PLAN**

1. Plaintiff pleads for monetary relief in excess of \$1,000,000.00 including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorneys' fees. Plaintiff pleads that discovery should be conducted in accordance with a discovery control plan pursuant to TEX. R. CIV. PRO. 190.4 (Level 3).

**II.**

**JURISDICTION AND VENUE**

2. This is a negligence action arising out of an automobile accident that occurred on or around December 20, 2019 in which Plaintiff sustained serious personal injuries. Plaintiff alleges Defendant JOHN DOE was negligent in the operation of a commercial motor vehicle and was in the course and scope of his employment with Defendant GOLDEN TRUCKING LLC.

3. This Court has jurisdiction over this case pursuant to the TEXAS CONSTITUTION, ARTICLE 5, § 8, and TEX. GOV'T CODE § 24.007.

4. Venue is proper pursuant to TEX. CIV. PRAC. & REM. CODE § 15.002.

### **III.** **PARTIES**

5. Plaintiff resides in Travis County, Texas.

6. GOLDEN TRUCKING LLC is a foreign limited liability company that is headquartered at 8700 W 36<sup>th</sup> Street, Ste. 128, Minneapolis, MN 55426 and may be served with process through serving the Secretary of State via regular mail located at Secretary of State, P.O. Box 12079, Austin, Texas 78711-2079 pursuant to TEX. CIV. PRAC. & REM. CODE §§17.041-17.044. *Service is hereby requested on this Defendant by private process.*

7. Defendant JOHN DOE is an individual whose identity is not known at this time. JOHN DOE was in the course and scope of his employment with the Defendant GOLDEN TRUCKING LLC.

### **IV.** **FACTS**

8. This case arises out of a commercial motor vehicle accident in Austin, Texas on December 20, 2019. Plaintiff was parked in his vehicle in a United States Post Office parking lot located at 8557 Research Blvd Ste. 124, Austin, Texas 78758 when a commercial 18-wheeler operated by DOE and owned and controlled by GOLDEN, backed up and struck Plaintiff's vehicle causing serious personal injuries to Plaintiff. At all relevant times JOHN DOE was in the course and scope of his employment with GOLDEN TRUCKING LLC.

V.  
**CAUSES OF ACTION**

**NEGLIGENCE**

9. Plaintiff incorporates the assertions contained in the foregoing paragraphs.

10. At the time of the accident made the basis of this lawsuit, Defendant JOHN DOE was operating the GOLDEN truck negligently. Defendant had a duty to exercise ordinary care and operate his vehicle reasonably and prudently. Defendant breached that duty in one or more of the following ways:

- a. failing to timely apply his brakes;
- b. failing to maintain a proper lookout;
- c. failing to turn the vehicle in order to avoid the collision;
- d. driving the vehicle at a rate of speed that an ordinary and prudent person would not have driven under the same or similar circumstances, thereby violating TEX. TRANSPORTATION CODE § 545.351 (negligence per se);
- e. failing to control his speed; and
- f. failing to maintain an assured clear distance.

11. As a proximate cause of Defendants' negligence, Plaintiff suffered damages including property damage and personal injuries. Specifically, Plaintiff has incurred medical expenses, pain and suffering and mental anguish and impairment. At all relevant times JOHN DOE was operating the vehicle in his course and scope of his employment with GOLDEN. As such, GOLDEN is vicariously liable for the negligent acts of its driver, JOHN DOE. Moreover, pleading upon information and belief, GOLDEN negligently trained, supervised and hired the driver JOHN DOE. This negligence was a proximate cause of Plaintiff's injuries and damages.

**VI.**  
**DAMAGES**

12. Plaintiff incorporates the assertions contained in the foregoing paragraphs.

13. Plaintiff has suffered damages in an amount that exceeds the minimum jurisdictional limits of this Court. Accordingly, Plaintiff requests that the jury award him a fair amount under the circumstances for the damages.

14. Plaintiff suffered damages including property damage and personal injuries. Plaintiff has incurred medical expenses, pain and suffering and mental anguish and impairment. Plaintiff expects to incur medical expenses, pain and suffering and mental anguish, and impairment in the future.

15. Plaintiff also requests the Court award him pre-judgment and post-judgment interest.

16. All conditions precedent to bring this lawsuit have occurred or have been performed.

**VII.**  
**JURY DEMAND**

17. Plaintiff demands a trial by jury in accordance with the TEX. R. CIV. P. 216 and TEX. R. CIV. P. 217. Accordingly, Plaintiff tenders the proper jury fee with the filing of the Original Petition in this matter.

**VIII.**  
**PRAYER**

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that Defendants be cited to appear and answer and that upon a final hearing of this cause, judgment be entered for the Plaintiff against Defendants for damages in an amount within the limits of the Court together with pre-judgment interest (from the date of accident through the date of judgment) at the maximum rate



allowed by law; post-judgment interest at the legal rate; costs of court; the aggregate of which is within the jurisdictional limits of this court, and such other and further relief to which Plaintiff may be entitled at law or in equity.

Respectfully submitted,

**WENHOLZ | DOW P.C.**

By: /s/ J. Luke Dow

J. Luke Dow

Texas Bar No. 00793636

ldow@wenholzdow.com

Sean B. Swords

Texas Bar No. 24102554

sswords@wenholzdow.com

9433 Bee Caves Rd., Ste. 1-200

Austin, Texas 78733

(512) 478-2211

(512) 478-3625 (fax)

**ATTORNEYS FOR PLAINTIFF**

# **EXHIBIT 2c**

CITATION  
THE STATE OF TEXAS  
CAUSE NO. D-1-GN-21-004933

CARL CANNON

VS.

GOLDEN TRUCKING LLC; JOHN DOE

TO: GOLDEN TRUCKING LLC  
8700 W 36TH STREET STE 28  
MINNEAPOLIS MN 55426  
Secretary of State,  
P.O. Box 12079  
Austin, Texas 78711-2079

Defendant, in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org."

Attached is a copy of the **PLAINTIFF'S FIRST AMENDED PETITION** of **CANNON, CARL** in the above styled and numbered cause, which was filed on **September 29, 2021** in the 201st District Court of Travis County, Austin, Texas.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office on, **October 11, 2021**

REQUESTED BY:  
DOW, JASON LUKE  
9433 BEE CAVE RD STE 1-200  
AUSTIN, TX 78733-6138  
Work: 512-478-2211



*[Signature]*  
Velva L. Price  
Travis County District Clerk  
Travis County Courthouse  
1000 Guadalupe, P.O. Box 679003 (78767)  
Austin, TX 78701

PREPARED BY: Adrian Rodriguez

## RETURN

Came to hand on the 15 day of October, 2021 at 5 o'clock P M., and executed at 1019 Blazos St within the County of Travis on the 18 day of October, 2021, at 11:30 o'clock A M., by delivering to the within named Golden Trucking, LLC Through Secretary of State Citations Unit, each in person, a true copy of this citation together with the **PLAINTIFF'S FIRST AMENDED PETITION** accompanying pleading, having first attached such copy of such citation to such copy of pleading and endorsed on such copy of citation the date of delivery.

Service Fee: \$ \_\_\_\_\_

Sworn to and subscribed before me this the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Notary Public, THE STATE OF TEXAS

D-1-GN-21-004933

~~Sheriff / Constable~~ / Authorized Person

By: \_\_\_\_\_

Printed Name of Server

\_\_\_\_\_, County, Texas

SERVICE FEE NOT PAID

RECEIVED  
21 OCT 19 AM 11:29  
SECRETARY OF STATE  
AUSTIN, TEXAS

333060

# **EXHIBIT 2d**

CITATION  
THE STATE OF TEXAS  
CAUSE NO. D-1-GN-21-004933

CARL CANNON

VS.

GOLDEN TRUCKING LLC; JOHN DOE

TO: GOLDEN TRUCKING LLC  
8700 W 36TH STREET STE 28  
MINNEAPOLIS MN 55426  
Secretary of State,  
P.O. Box 12079  
Austin, Texas 78711-2079

Defendant, in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org."

Attached is a copy of the **PLAINTIFF'S FIRST AMENDED PETITION** of **CANNON, CARL** in the above styled and numbered cause, which was filed on **September 29, 2021** in the 201st District Court of Travis County, Austin, Texas.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office on, **October 11, 2021**

REQUESTED BY:  
DOW, JASON LUKE  
9433 BEE CAVE RD STE 1-200  
AUSTIN, TX 78733-6138  
Work: 512-478-2211



*[Signature]*  
Velva L. Price  
Travis County District Clerk  
Travis County Courthouse  
1000 Guadalupe, P.O. Box 679003 (78767)  
Austin, TX 78701

PREPARED BY: Adrian Rodriguez

## RETURN

Came to hand on the 15 day of October, 2021 at 5 o'clock P M., and executed at  
1019 Blazos St within the County of Travis on the 18  
day of October, 2021, at 11:30 o'clock A M., by delivering to the within named  
Golden Trucking, LLC Through Secretary of State Citations Unit, each in person, a true copy of this citation  
together with the **PLAINTIFF'S FIRST AMENDED PETITION** accompanying pleading, having first attached such copy of such  
citation to such copy of pleading and endorsed on such copy of citation the date of delivery.

Service Fee: \$ \_\_\_\_\_

Sworn to and subscribed before me this the

\_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Notary Public, THE STATE OF TEXAS

D-1-GN-21-004933

\_\_\_\_\_  
~~Sheriff / Constable~~ / Authorized Person

By: \_\_\_\_\_

\_\_\_\_\_  
Printed Name of Server\_\_\_\_\_  
County, Texas

SERVICE FEE NOT PAID

SECRETARY OF STATE  
AUSTIN, TEXAS

21 OCT 19 AM 11:29

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# **EXHIBIT 2e**

The State of Texas



Service of Process  
P.O. Box 12079  
Austin, Texas 78711-2079

Phone: 512-463-5560  
Fax: 512-463-0873  
Dial 7-1-1 For Relay Services  
[www.sos.texas.gov](http://www.sos.texas.gov)

Jose A. Esparza  
Deputy Secretary of State

October 22, 2021

Golden Trucking LLC  
8700 W 36th Street, Ste 28  
Minneapolis, MN 55426

2022-333060-1

**Include reference number  
in all correspondence**

RE: Carl Cannon vs Golden Trucking LLC, et al  
201st Judicial District Court Of Travis County, Texas  
Cause No. D1GN21004933

Dear Sir/Madam,

Pursuant to the Laws of Texas, we forward herewith by CERTIFIED MAIL, return receipt requested, a copy of the process received by the Secretary of State of the State of Texas on October 18, 2021.

CERTIFIED MAIL #71901046470101352740

Refer correspondence to:

J. Luke Dow  
Wenholz Dow PC  
9433 Bee Caves Road Ste 1-200  
Austin, TX 78733

Sincerely,

Service of Process  
Government Filings  
512-463-1662  
GF/wj  
Enclosure

Secretary of State  
Service of Process  
P.O. Box 12079  
Austin, Texas 78711-2079



7190 1046 4701 0135 2740

**Return Receipt (Electronic)**

2022333060-1

Golden Trucking LLC  
8700 W 36th Street, Ste 28  
Minneapolis, MN 55426

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CUT / FOLD HERE



CITATION  
THE STATE OF TEXAS  
CAUSE NO. D-1-GN-21-004933

CARL CANNON

VS.

GOLDEN TRUCKING LLC; JOHN DOE

TO: GOLDEN TRUCKING LLC  
8700 W 36TH STREET STE 28  
MINNEAPOLIS MN 55426  
Secretary of State,  
P.O. Box 12079  
Austin, Texas 78711-2079

Defendant, in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org."

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ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office on, **October 11, 2021**

REQUESTED BY:  
DOW, JASON LUKE  
9433 BEE CAVE RD STE 1-200  
AUSTIN, TX 78733-6138  
Work: 512-478-2211



*[Signature]*  
Velva L. Price  
Travis County District Clerk  
Travis County Courthouse  
1000 Guadalupe, P.O. Box 679003 (78767)  
Austin, TX 78701

PREPARED BY: Adrian Rodriguez

## RETURN

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Service Fee: \$ \_\_\_\_\_

Sworn to and subscribed before me this the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Notary Public, THE STATE OF TEXAS

D-1-GN-21-004933

~~Sheriff / Constable~~ / Authorized Person

By: \_\_\_\_\_

Printed Name of Server

\_\_\_\_\_, County, Texas

SERVICE FEE NOT PAID

RECEIVED  
21 OCT 19 AM 11:29  
SECRETARY OF STATE  
AUSTIN, TEXAS

333060

**CAUSE NO. D-1-GN-21-004933**

**CARL CANNON,**

*Plaintiff,*

**V.**

**GOLDEN TRUCKING LLC and  
JOHN DOE,**

*Defendants.*

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**IN THE DISTRICT COURT OF**

**TRAVIS COUNTY, T E X A S**

**201<sup>ST</sup> JUDICIAL DISTRICT**

**PLAINTIFF'S FIRST AMENDED PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Plaintiff CARL CANNON and complains of Defendants GOLDEN TRUCKING LLC ("GOLDEN") and JOHN DOE ("DOE") and respectfully shows the court as follows:

**I.**

**DISCOVERY CONTROL PLAN**

1. Plaintiff pleads for monetary relief in excess of \$1,000,000.00 including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorneys' fees. Plaintiff pleads that discovery should be conducted in accordance with a discovery control plan pursuant to TEX. R. CIV. PRO. 190.4 (Level 3).

**II.**

**JURISDICTION AND VENUE**

2. This is a negligence action arising out of an automobile accident that occurred on or around December 20, 2019 in which Plaintiff sustained serious personal injuries. Plaintiff alleges Defendant JOHN DOE was negligent in the operation of a commercial motor vehicle and was in the course and scope of his employment with Defendant GOLDEN TRUCKING LLC.

3. This Court has jurisdiction over this case pursuant to the TEXAS CONSTITUTION, ARTICLE 5, § 8, and TEX. GOV'T CODE § 24.007.

4. Venue is proper pursuant to TEX. CIV. PRAC. & REM. CODE § 15.002.

### **III.** **PARTIES**

5. Plaintiff resides in Travis County, Texas.

6. GOLDEN TRUCKING LLC is a foreign limited liability company that is headquartered at 8700 W 36<sup>th</sup> Street, Ste. 128, Minneapolis, MN 55426 and may be served with process through serving the Secretary of State via regular mail located at Secretary of State, P.O. Box 12079, Austin, Texas 78711-2079 pursuant to TEX. CIV. PRAC. & REM. CODE §§17.041-17.044. *Service is hereby requested on this Defendant by private process.*

7. Defendant JOHN DOE is an individual whose identity is not known at this time. JOHN DOE was in the course and scope of his employment with the Defendant GOLDEN TRUCKING LLC.

### **IV.** **FACTS**

8. This case arises out of a commercial motor vehicle accident in Austin, Texas on December 20, 2019. Plaintiff was parked in his vehicle in a United States Post Office parking lot located at 8557 Research Blvd Ste. 124, Austin, Texas 78758 when a commercial 18-wheeler operated by DOE and owned and controlled by GOLDEN, backed up and struck Plaintiff's vehicle causing serious personal injuries to Plaintiff. At all relevant times JOHN DOE was in the course and scope of his employment with GOLDEN TRUCKING LLC.

V.  
**CAUSES OF ACTION**

**NEGLIGENCE**

9. Plaintiff incorporates the assertions contained in the foregoing paragraphs.

10. At the time of the accident made the basis of this lawsuit, Defendant JOHN DOE was operating the GOLDEN truck negligently. Defendant had a duty to exercise ordinary care and operate his vehicle reasonably and prudently. Defendant breached that duty in one or more of the following ways:

- a. failing to timely apply his brakes;
- b. failing to maintain a proper lookout;
- c. failing to turn the vehicle in order to avoid the collision;
- d. driving the vehicle at a rate of speed that an ordinary and prudent person would not have driven under the same or similar circumstances, thereby violating TEX. TRANSPORTATION CODE § 545.351 (negligence per se);
- e. failing to control his speed; and
- f. failing to maintain an assured clear distance.

11. As a proximate cause of Defendants' negligence, Plaintiff suffered damages including property damage and personal injuries. Specifically, Plaintiff has incurred medical expenses, pain and suffering and mental anguish and impairment. At all relevant times JOHN DOE was operating the vehicle in his course and scope of his employment with GOLDEN. As such, GOLDEN is vicariously liable for the negligent acts of its driver, JOHN DOE. Moreover, pleading upon information and belief, GOLDEN negligently trained, supervised and hired the driver JOHN DOE. This negligence was a proximate cause of Plaintiff's injuries and damages.



**VI.**  
**DAMAGES**

12. Plaintiff incorporates the assertions contained in the foregoing paragraphs.

13. Plaintiff has suffered damages in an amount that exceeds the minimum jurisdictional limits of this Court. Accordingly, Plaintiff requests that the jury award him a fair amount under the circumstances for the damages.

14. Plaintiff suffered damages including property damage and personal injuries. Plaintiff has incurred medical expenses, pain and suffering and mental anguish and impairment. Plaintiff expects to incur medical expenses, pain and suffering and mental anguish, and impairment in the future.

15. Plaintiff also requests the Court award him pre-judgment and post-judgment interest.

16. All conditions precedent to bring this lawsuit have occurred or have been performed.

**VII.**  
**JURY DEMAND**

17. Plaintiff demands a trial by jury in accordance with the TEX. R. CIV. P. 216 and TEX. R. CIV. P. 217. Accordingly, Plaintiff tenders the proper jury fee with the filing of the Original Petition in this matter.

**VIII.**  
**PRAYER**

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that Defendants be cited to appear and answer and that upon a final hearing of this cause, judgment be entered for the Plaintiff against Defendants for damages in an amount within the limits of the Court together with pre-judgment interest (from the date of accident through the date of judgment) at the maximum rate

allowed by law; post-judgment interest at the legal rate; costs of court; the aggregate of which is within the jurisdictional limits of this court, and such other and further relief to which Plaintiff may be entitled at law or in equity.

Respectfully submitted,

**WENHOLZ | DOW P.C.**

By: /s/ J. Luke Dow

J. Luke Dow

Texas Bar No. 00793636

ldow@wenholzdow.com

Sean B. Swords

Texas Bar No. 24102554

sswords@wenholzdow.com

9433 Bee Caves Rd., Ste. 1-200

Austin, Texas 78733

(512) 478-2211

(512) 478-3625 (fax)

**ATTORNEYS FOR PLAINTIFF**

# **EXHIBIT 2f**

**CAUSE NO. D-1-GN-21-004933**

**CARL CANNON**  
*Plaintiff,*

vs.

**GOLDEN TRUCKING, LLC AND JOHN  
DOE**  
*Defendants.*

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**IN THE DISTRICT COURT OF**

**TRAVIS COUNTY, TEXAS**

**201<sup>ST</sup> JUDICIAL DISTRICT**

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**DEFENDANT GOLDEN TRUCKING, LLC'S ORIGINAL ANSWER**

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**TO THE HONORABLE JUDGE OF SAID COURT:**

COMES NOW, Golden Trucking, LLC, Defendant herein, and files its Original Answer to Plaintiff's First Amended Petition, and in support thereof would respectfully show unto this Honorable Court as follows:

**I.**  
**GENERAL DENIAL**

Defendant denies each and every, all and singular, the allegations contained in Plaintiff's Original Petition and demand strict proof thereof as authorized by Texas Rule of Civil Procedure 92.

**II.**  
**INITIAL DISCLOSURE**

Under Texas Rule of Civil Procedure 194.2, Defendant requests that Plaintiff make his initial disclosures, within thirty (30) days of the filing of Defendant's Original Answer, and provide information or material described in Rule 194.2(b) of the Texas Rules of Civil Procedure.



**III.**  
**NOTICE OF INTENT TO USE DOCUMENTS PRODUCED**  
**PURSUANT TO RULE 193.7**

Defendant places Plaintiff on notice that pursuant to Texas Rule of Civil Procedure 193.7, all documents produced by Plaintiff in this litigation are authenticated for use against the producing party in this case and may be used as evidence during pre-trial procedures and at trial of this matter.

**IV.**  
**PRAYER**

**WHEREFORE, PREMISES CONSIDERED,** Defendant Golding Trucking, LLC prays that upon final hearing hereof, Plaintiff takes nothing by way of this cause of action herein, that Defendant recover its costs herein expended, and for such other and further relief, at law or in equity, to which Defendant may show itself justly entitled to receive.

Respectfully submitted,

**SARGENT LAW, P.C.**

By: /s/ David Sargent  
**DAVID L. SARGENT**  
State Bar No. 17648700  
[david.sargent@sargentlawtx.com](mailto:david.sargent@sargentlawtx.com)

1717 Main Street, Suite 4750  
Dallas, Texas 75201-7346  
(214) 749-6000 (Telephone)  
(214) 749-6100 (Facsimile)

**ATTORNEYS FOR DEFENDANT,**  
**GOLDEN TRUCKING, LLC**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 11<sup>th</sup> day of November 2021, a true and correct copy of the foregoing document was forwarded via ECF to counsel for Plaintiff:

J. Luke Dow  
Sean B. Swords  
WENHOLZ \ DOW PC  
9433 Bee Caves Road, Suite 1-200  
Austin, Texas 78733  
[ldow@wenholzdow.com](mailto:ldow@wenholzdow.com)  
[sswords@wenholzdow.com](mailto:sswords@wenholzdow.com)

*/s/ David Sargent*

\_\_\_\_\_  
**DAVID L. SARGENT**

# **EXHIBIT 2g**

**CAUSE NO. D-1-GN-21-004933**

**CARL CANNON**  
*Plaintiff,*

vs.

**GOLDEN TRUCKING, LLC AND JOHN  
DOE**  
*Defendants.*

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**IN THE DISTRICT COURT OF**

**TRAVIS COUNTY, TEXAS**

**201<sup>ST</sup> JUDICIAL DISTRICT**

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**DEFENDANT GOLDEN TRUCKING, LLC'S REQUEST FOR JURY TRIAL**

---

**TO THE HONORABLE JUDGE OF SAID COURT:**

COMES NOW, Golden Trucking, LLC, Defendant herein, and request that a jury trial be held on said cause. A jury fee has been paid by Defendant.

Respectfully submitted,

**SARGENT LAW, P.C.**

By: /s/ David Sargent  
**DAVID L. SARGENT**  
State Bar No. 17648700  
[david.sargent@sargentlawtx.com](mailto:david.sargent@sargentlawtx.com)

1717 Main Street, Suite 4750  
Dallas, Texas 75201-7346  
(214) 749-6000 (Telephone)  
(214) 749-6100 (Facsimile)

**ATTORNEYS FOR DEFENDANT,  
GOLDEN TRUCKING, LLC**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 11<sup>th</sup> day of November 2021, a true and correct copy of the foregoing document was forwarded via ECF to counsel for Plaintiff:

J. Luke Dow  
Sean B. Swords  
WENHOLZ | DOW PC  
9433 Bee Caves Road, Suite 1-200  
Austin, Texas 78733  
[ldow@wenholzdow.com](mailto:ldow@wenholzdow.com)  
[sswords@wenholzdown.com](mailto:sswords@wenholzdown.com)

*/s/ David Sargent*

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